

Syniverse

Talking points for FCC meeting on 2/10/05

Subject: Mandatory FCC outage reporting

Issue: Disparate reporting requirements between Syniverse as an SS7 network services provider and its customers.

Discussion:

Syniverse has experienced two FCC reportable outages in January '05. Of those events, one has been withdrawn, the other a final report has been submitted. Both outages were due to customer activity within their network.

Outage #1 – Wireless Service Corp. – Syniverse experienced a 39 minute isolation between the Syniverse STPs and the customer's STPs. During that time, 67,000 MSUs were lost based on historical traffic loads. Wireless Service Corp. subscriber impact unknown, however, no call completion messaging (i.e. ISUP messaging) traverse the links.

Wireless service provider criteria are not the same as Signaling System 7 service providers in that it is not specifically stated that a wireless services provider must report a STP isolation. Discussions with customer revealed that they did not file outage reports with the FCC and had no plans to do so. Syniverse informed customer of outage reporting requirement for Syniverse and copied them on all reports filed.

This disparate set of reporting requirements supports the observations made in our Petition for Reconsideration of Syniverse Technologies presented to the FCC. Additionally, the reporting requirements seem to violate the spirit of Consistent Reporting and Common Metrics identified in the Report and Order and Further Notice of Proposed Rule Making presented by the Commission.

Outage #2 – Iris Wireless – Syniverse experienced an extended outage of SS7 A-Links that surpassed the 167,000 historic MSUs lost with this customer. The root cause of the outage was extended maintenance that the customer was performing on their node. Upon further investigation and collaboration with the customer, it was determined that there was no impact to the Iris Wireless subscribers. Syniverse in turn withdrew our initial outage report based on the information that no subscribers were impacted.

This event also supports the observation made in the Petition for Reconsideration of Syniverse Technologies presented to the FCC. It is very difficult if not impossible for Syniverse to determine the impact a signaling outage may have on the end subscriber. The decision to withdraw the report was solely based on information provided by the Syniverse customer. This again presents a potential conflict and may undermine the intent of the new FCC outage reporting criteria. Inequitable application of the reporting requirement violates the spirit of consistent reporting by the parties involved.

Summary: Syniverse has made significant efforts to comply with the new FCC Outage Reporting Rules that came into effect on January 3, 2005. We have developed tools to determine the loss of MSU data over a period of time in order to identify when identified thresholds are met for Outage Reporting. Our experience so far has indicated that there is a disparate set of reporting requirements that have resulted in Syniverse submitting outage reports to the FCC without reciprocation from the carriers involved. In question is whether the outage reports filed to the FCC under these circumstances meet the spirit and intent of the new outage reporting rules.